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Attorneys for Plaintiff

UNITED STATES DISTRICT COURT  
 NORTHERN DISTRICT OF CALIFORNIA  
 SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,	)	No. CR 05-657 MMC
	)	
Plaintiff,	)	
	)	
v.	)	STIPULATION AND <del>PROPOSED</del>
	)	ORDER EXCLUDING TIME FROM
CARMINA DANICA SANTOS,	)	FEBRUARY 1, 2006 TO APRIL 5, 2006
	)	FROM THE SPEEDY TRIAL ACT
Defendant.	)	CALCULATION (18 U.S.C.
	)	§ 3161(h)(8)(A))

The parties appeared before the Court on February 1, 2006 and March 1, 2006. With the agreement of the parties, and with the consent of the defendant, the Court enters this order scheduling a status hearing on April 5, 2006, at 2:30 p.m., and documenting the exclusion of time under the Speedy Trial Act, 18 U.S.C. § 3161(h)(8)(A), from February 1, 2006 to April 5, 2006.

The parties agreed, and the Court found and held, as follows:

1. The parties agreed to an exclusion of time under the Speedy Trial Act. Failure to grant the requested continuance would unreasonably deny defense counsel reasonable time necessary for effective preparation, taking into account Defendant's counsel's three-week vacation, Defendant's counsel's need to review discovery, and the government's need to collect additional

1 discovery. Failure to grant the requested continuance would also deny the defendant continuity  
2 of counsel.

3 2. Given these circumstances, the Court found that the ends of justice served by  
4 excluding the period from February 1, 2006 to April 5, 2006, outweigh the best interest of the  
5 public and the defendant in a speedy trial. Id. § 3161(h)(8)(A).

6 3. Accordingly, and with the consent of the defendant, the Court ordered that the period  
7 from February 1, 2006 to April 5, 2006, be excluded from Speedy Trial Act calculations under 18  
8 U.S.C. § 3161(h)(8)(A) & (B)(iv).

9 5. The parties will appear at a status hearing on April 5, 2006, 2005, at 2:30 p.m.

10 IT IS SO STIPULATED.

11  
12 DATED: \_\_\_\_\_

\_\_\_\_\_  
/s/  
TRACIE L. BROWN  
Assistant United States Attorney

13  
14  
15 DATED: \_\_\_\_\_

\_\_\_\_\_  
/s/  
RONALD TYLER  
Attorney for Carmina Danica Santos

16  
17 IT IS SO ORDERED.

18  
19 DATED: April 6, 2006 \_\_\_\_\_

  
\_\_\_\_\_  
THE HON. MAXINE M. CHESNEY  
United States District Judge